UNITED STATES BANKRUPTCY COURT MIDDLE DISTRICT OF PENNSYLVANIA

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Michale Owen Harr

Debtor 1

Shannon Michele Harr

Debtor 2

Chapter 13

Case No. 1:18-BK-05170-HWV

Matter: Motion for Termination of Wage Attachment

Order

MOTION FOR TERMINATION OF WAGE ATTACHMENT ORDER

AND NOW, come the Debtor(s), Michale Owen Harr and Shannon Michele Harr, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Motion for Termination of Wage Attachment Order and aver as follows:

- 1) Debtor(s) filed a Chapter 13 Petition on or about December 10, 2018.
- 2) Debtor 1 receives regular income from employment with Chambersburg Area School District which has been attached under 11 U.S.C. §1326 to fund Debtor(s)' Chapter 13 Plan.
 - 3) Debtor 1 wishes to terminate this wage attachment.

WHEREFORE, Debtor(s) respectfully requests that this Court enter an Order directing the above-mentioned employer to cease immediately this wage attachment to the Standing Chapter 13 Trustee.

Respectfully submitted,

Date: September 13, 2023 /s/ Michale Owen Harr

Debtor 1

DETHLEFS PYKOSH & MURPHY

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire PA ID No. 201207 2132 Market Street Camp Hill, PA 17011 (717) 975-9446 pmurphy@dplglaw.com Attorney for Debtor(s)

Desc

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ORDER OF COURT

UPON CONSIDERATION of the above-referenced Debtor(s)' Motion for Termination of Wage Attachment Order, IT IS HEREBY ORDERED that until further Order of this Court, the entity from whom Debtor 1 receives income should immediately cease the wage attachment in the amount of \$438.92 from each bi-weekly paycheck.

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CERTIFICATE OF SERVICE

I hereby certify that on Wednesday, September 13, 2023, I served a true and correct copy of the Debtor(s)' Motion for

Termination of Wage Attachment Order and proposed Order in this proceeding upon the following:

Via USPS First Class Mail
Chambersburg Area School District
Attn: Payroll Department
435 Stanley Avenue
Chambersburg, PA 17201

<u>Via Electronic Means</u>
Jack H. Zaharopoulos, Esquire
Standing Chapter 13 Trustee

8125 Adams Drive, Suite A

Hummelstown, PA 17036

Office of the United States Trustee Sylvia H. Rambo US Courthouse 1501 North Sixth Street, 3rd Floor Harrisburg, PA 17102

/s/ Kathryn S. Greene

Kathryn S. Greene, RP®, Pa.C.P. Paralegal for Paul D. Murphy-Ahles, Esquire